## UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

In re: Wilfred Cannon ) Case Number: 12-19038

) Chapter 13 Proceedings

Debtor. ) Judge Arthur I. Harris

## TRUSTEE'S OBJECTION TO MOTION FOR AUTHORITY TO ENTER INTO LOAN MODIFICATION

Now comes CRAIG SHOPNECK, the duly appointed, qualified, and standing Chapter 13 Trustee ("Trustee") herein, by and through counsel, and hereby objects to the Motion for Authority to Enter into Loan Modification (the "Motion"). In support of his objection, Trustee makes the following representations to this Honorable Court:

1. On December 13, 2012, Debtor filed a voluntary petition for relief under Chapter 13 of Title 11, U.S.C. On March 25, 2013, this Court entered the order confirming the modified Chapter 13 Plan (the "Plan"). The Plan requires monthly payments to Trustee in the amount of one thousand one hundred sixty-one and 00/100 dollars (\$1,161.00) and a dividend to unsecured creditors of zero percent (0%).

2. Although Debtor has filed an amended Schedule I-Current Income of Individual Debtor(s) and an amended Schedule J-Current Expenditures of Individual Debtor(s) reflecting his current financial circumstances, Trustee is respectfully requesting copies of any and all documentation submitted to the mortgage creditor by Debtor in conjunction with the loan modification.

3. Trustee reserves the right to amend and/or supplement his objection should additional information be provided.

WHEREFORE your Trustee, being a proper party in interest, hereby moves this Honorable Court to sustain his objection and deny the Motion for the aforementioned reasons cited.

Respectfully submitted,

/S/ Philip D. Lamos

PHILIP D. LAMOS (#0066844) Attorney for Craig Shopneck, Chapter 13 Trustee 200 Public Square, Suite 3860 Cleveland, OH 44114-2321 (216) 621-4268

## **CERTIFICATE OF SERVICE**

I hereby certify that on October 3, 2013, a true and correct copy of Trustee's Objection to Motion for Authority to Enter into Loan Modification was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Lee R. Kravitz, on behalf of Wilfred Cannon, Debtor, at <a href="leekravitz@sbcglobal.net">leekravitz@sbcglobal.net</a>

And by regular U.S. mail, postage prepaid, on:

Wilfred Cannon, Debtor, at 18408 Windward Road, Cleveland, OH 44119

/S/ Philip D. Lamos

PHILIP D. LAMOS (#0066844)

PDL/dlr 10/3/13